

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 2001

POSTAL RATE COMMISSION  
Docket No. R2001-01 THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA  
THIRD SET OF INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS LARAINÉ HOPE  
(NAA/USPS-T31-19-21)  
November 16, 2001**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Laraine Hope (USPS-T-31) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the instant document on all participants requesting such service in this proceeding in accordance with section 12 of the Rules of Practice.

November 16, 2001

William B. Baker  
William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA  
INTERROGATORIES TO  
UNITED STATES POSTAL SERVICE WITNESS LARAINÉ HOPE  
(NAA/USPS-T31-19-21)

NAA/USPS-T31-19: Please reconcile the revenue for Standard commercial Enhanced Carrier Route mail of \$5,555.7 at page 49, Table 15 of your testimony with

NAA/USPS-T31-20: Please confirm:

- a. That the volumes you use in designing rates for Standard A ECR mail are derived from LR-J-125, which is based upon the volume forecasting testimony of witness Tolley;
- b. That the cost savings which you use in designing rates are based on the testimony of witness Schenk, which used the volume forecasts in LR-J-117;
- c. That the following table accurately reflects the forecasted volumes used by witnesses Tolley and Schenk in the cited library references:

	<b>Tolley</b>			<b>Schenk</b>	<b>% Difference</b>
	<b>Commercial</b>	<b>Non-profit</b>	<b>Total ECR</b>	<b>Total ECR</b>	
<b>ECR Letters</b>	3,545.81	546.28	4,092.08	4,892.02	19.55%
<b>ECR Nonletters</b>	12,637.04	1,211.36	13,848.40	13,408.35	-3.18%
<b>Auto C/R</b>	2,104.82	301.14	2,405.96	2,365.74	-1.67%
<b>High Density L</b>	360.09	73.60	433.69	517.85	19.41%
<b>High D NL</b>	1,834.14	14.94	1,849.08	1,597.27	-13.62%
<b>Saturation L</b>	3,804.20	699.56	4,503.76	4,591.99	1.96%
<b>Saturation NL</b>	9,587.68	405.65	9,993.33	9,753.08	-2.40%

Notes:

Tolley numbers from LR-125

Schenk numbers from LR-117, divided by 1000 to correspond to Tolley units

If you cannot confirm these figures, please explain why not.

- d. Please explain why you propose rates based on a different volume forecast than is used in calculating the unit cost savings.

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(NAA/USPS-T31-19-21)

NAA/USPS-T31-21: Please refer to your Workpaper 1, page Q, and Workpaper 1, page X. Is there a relationship between the revenue figure from line 31 of page Q (which you use in your testimony) and the Net Revenue figure of page X, column 21? Please explain.